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JUN **27** 2007

CHAMBERS OF

June 26, 2007

VLA FACSIMILE (212) 805-7948

The Honorable Richard J. Holwell United States District Court Southern District of New York 500 Pearl Street, Courtroom 17B New York, New York 10007

Re:

Nelly Feliz v. JPMorgan Chase & Co.

Docket No. 07-cv-05694

Dear Judge Holwell:

Pursuant to a telephone conversation with Mr. William J. Donald today, the <u>defendant</u> ("JPMorgan") in the above-referenced matter hereby requests an additional 30 days in which to answer or otherwise respond to the *Complaint*.

JPMorgan removed this action to this Court on June 14, 2007. An answer or other response was due five days later, on June 19, 2007. On June 19, 2007, JPMorgan filed its first motion to extend the time to respond to the *Complaint*. JPMorgan sought the consent of Plaintiff's counsel to that motion, but Plaintiff's counsel did not respond to several messages. The Court has not yet ruled on the first motion.

JPMorgan seeks an extension until July 26, 2007 in order that it may complete its investigation and response to the *Complaint*. This is the second such request for an extension of time. Plaintiff's counsel has still not responded to JPMorgan's request for an extension.

Very truly yours,

Joseph Geoghegan, Esq.

Derek T. Smith, Esq. (via regular mail)

Application Cranted

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